

APRIL L. HOLLINGSWORTH (Bar No. 9391)  
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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

<p><b>JUDITH PINBOROUGH ZIMMERMAN, Ph.D.,</b></p> <p>Plaintiff,</p> <p>vs.</p> <p><b>UNIVERSITY OF UTAH and WILLIAM McMAHON, Ph.D.,</b></p> <p>Defendants.</p>	<p><b>DECLARATION OF APRIL L. HOLLINGSWORTH IN SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEYS' FEES</b></p> <p>Case No. 2:13-cv-1131</p> <p>Judge Jill N. Parrish</p>
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I, April L. Hollingsworth, under penalty of perjury, hereby testify and declare as follows:

1. I have personal knowledge of all of the facts set forth herein, and would competently testify to these facts if called upon to do so in a court of law.
2. I graduated from law school in 1996, and was admitted to practice law in the state of Georgia in June 1996.
3. I was admitted to the Bar of the State of Utah in June 2002.

4. I am formerly a partner at Strindberg & Scholnick, LLC, where I started practicing employment law in 2002.

5. In November 2008, I formed my own firm, Hollingsworth Law Office, LLC.

6. My firm began representing Dr. Judith Zimmerman in September 2014 on a reduced hourly rate/partial contingency basis, as I believed the case was important to pursue, and Dr. Zimmerman was unable to continue funding the litigation paying full hourly rates as she had done with the first law firm that represented her.

7. Initially, my then-associate, Ashley Leonard, handled most of the litigation, and my involvement was in an advisory role (much of which I did not bill). Ms. Leonard is a 2013 graduate of Gonzaga University School of Law. She became my full-time associate in March 2014. Her normal hourly rate was \$150/hour at the time. She billed 275.6 hours to this case, for a total of \$41,340. Her reports of hours billed to this case are attached hereto as Exhibit A.

8. Ms. Leonard left my firm in August 2016, after which I became the primary attorney on Dr. Zimmerman's case. I did, however, hire an attorney, Katie Bushman, on a contract basis to assist in researching the issues to be addressed by the Utah Supreme Court in December 2016. Ms. Bushman was admitted to the Utah Bar in October 2015. She billed 35.7 hours to this case, as set forth in Exhibit B. A reasonable billing rate for her at that time is \$125/hour, for a total in billable time of \$4,462.50.

9. The time I have billed to this case since September 2014 is attached hereto as Exhibit C, which itemizes the approximately 470 hours I have worked on the case. At the end of July 2018, I hired Katie Panzer, a 2018 law school graduate, to assist with trial. Although she has passed

the Bar, she has not yet been admitted. Her time billed (186 hours) is included in Exhibit C. A reasonable rate for her time is \$95/hour.

10. I bill my time at a rate of \$375/hour, which is a reasonable rate for an employment law attorney in Salt Lake City who has been in practice for over 20 years, and has over 10 years of litigation experience, including several successful jury trials in employment cases. Further, I was named Employment Attorney of the Year by the Labor and Employment Section of the Utah State Bar in 2015, and won what I understand to be the biggest single-plaintiff employment law jury verdict ever in Utah (\$2.77 million) in June 2017.

11. All the work I have done in this case, and have hired others to do, has been necessary to adequately and successfully take Dr. Zimmerman's claims against the University through discovery, several summary judgment motions and motions to dismiss, the Utah Supreme Court proceedings, and through trial.

12. Based on the aforementioned information and invoices attached, Dr. Zimmerman's attorneys' fees incurred in this case that are attributable to work done by Hollingsworth Law Office, LLC total \$237,099.50: \$41,340 for time billed by Ms. Leonard; \$4,462.50 for time billed by Katie Bushman; and \$191,297 for time billed by Ms. Panzer and me.

DATED this 19th day of September, 2018.

/s/ April Hollingsworth

Attorney for Plaintiff



# Detailed report

2014-01-01 - 2014-12-31

Total **23 h 39 min** Billable 23 h 39 min

Zimmerman v. UofU selected as projects

Date	Description	Duration	User
09-04	Phone call to previous counsel re: client file Hollingsworth - Zimmerman v. UofU	00:12:00	Hollingsworth Law
09-24	Call to opposing counsel re: extending deadlines Hollingsworth - Zimmerman v. UofU	00:12:00	Hollingsworth Law
09-25	Drafted Amended Sched Order Hollingsworth - Zimmerman v. UofU	00:24:00	Hollingsworth Law
10-05	Went thru Defs' initial disclosures Hollingsworth - Zimmerman v. UofU	03:36:00	Hollingsworth Law
10-06	Went thru Defs' initial disclosures Hollingsworth - Zimmerman v. UofU	04:00:00	Hollingsworth Law
11-05	Went thru discovery Hollingsworth - Zimmerman v. UofU	02:48:18	Hollingsworth Law
12-16	Drafted Amended Complaint Hollingsworth - Zimmerman v. UofU	04:30:00	Hollingsworth Law
12-18	Research for amended compl Hollingsworth - Zimmerman v. UofU	01:04:00	Hollingsworth Law
12-19	Drafted Amended Complaint Hollingsworth - Zimmerman v. UofU	00:17:23	Hollingsworth Law
12-22	Drafted discovery Hollingsworth - Zimmerman v. UofU	06:00:00	Hollingsworth Law
12-23	Edited and sent out discovery Hollingsworth - Zimmerman v. UofU	00:36:00	Hollingsworth Law

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# Detailed report

2015-01-01 - 2015-12-31

Total **202 h 49 min** Billable 202 h 49 min

Zimmerman v. UofU selected as projects

Date	Description	Duration	User
01-13	<b>Drafted Mot Amend Sched Order</b> Zimmerman v. UofU	42:00 min	Ashley Leonard
01-13	<b>Phone call with OC</b> Zimmerman v. UofU	12:00 min	Ashley Leonard
01-13	<b>Edited Mot to Amend</b> Zimmerman v. UofU	18:00 min	Ashley Leonard
01-13	<b>Emails to OC</b> Zimmerman v. UofU	12:00 min	Ashley Leonard
01-14	<b>Emails to OC</b> Zimmerman v. UofU	18:00 min	Ashley Leonard
01-14	<b>Email to client</b> Zimmerman v. UofU	12:00 min	Ashley Leonard
01-14	<b>Edited and filed Motions to Amend (Compl + Sched Order)</b> Zimmerman v. UofU	30:00 min	Ashley Leonard
01-22	<b>Filed Amended Compl.</b> Zimmerman v. UofU	18:00 min	Ashley Leonard
02-18	<b>Emails to client</b> Zimmerman v. UofU	24:00 min	Ashley Leonard
02-19	<b>Meeting with client</b> Zimmerman v. UofU	30:00 min	Ashley Leonard
03-07	<b>Prep for witnesses questions</b> Zimmerman v. UofU	01:05:33	Ashley Leonard
03-09	<b>Called witnesses</b> Zimmerman v. UofU	02:42:00	Ashley Leonard
03-11	<b>Phone call with OC</b> Zimmerman v. UofU	30:00 min	Ashley Leonard
03-16	<b>Noticed depositions</b> Zimmerman v. UofU	36:00 min	Ashley Leonard
03-17	<b>Emails to client and OC</b> Zimmerman v. UofU	18:00 min	Ashley Leonard
06-29	<b>Phone call with HHS atty re case status</b> Zimmerman v. UofU	12:00 min	Ashley Leonard
07-15	<b>Uploaded docs from Defs</b> Zimmerman v. UofU	18:00 min	Ashley Leonard
07-15	<b>Emails to client and OC re production of docs</b> Zimmerman v. UofU	12:00 min	Ashley Leonard

Ex. A -002

<b>07-20</b>	<b>Edited client's letter to congressman</b>  Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>08-05</b>	<b>Drafted Notice of Depos, scheduled with court reporters</b>  Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>08-05</b>	<b>Emails to OC and client re depo schedule</b>  Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>08-09</b>	<b>Reviewed and finalized response to HHS questionnaire</b>  Zimmerman v. UofU	<b>01:51:58</b>	Ashley Leonard
<b>08-10</b>	<b>Phone call with witness Soni</b>  Zimmerman v. UofU	<b>30:00 min</b>	Ashley Leonard
<b>08-10</b>	<b>Emails to client re discovery</b>  Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
<b>08-10</b>	<b>Went thru Defs' discovery production</b>  Zimmerman v. UofU	<b>01:18:21</b>	Ashley Leonard
<b>08-11</b>	<b>Went thru Defs' discovery production</b>  Zimmerman v. UofU	<b>03:02:11</b>	Ashley Leonard
<b>08-11</b>	<b>Edited and finalized HHS responses</b>  Zimmerman v. UofU	<b>01:12:34</b>	Ashley Leonard
<b>08-12</b>	<b>Went thru Defs' discovery production</b>  Zimmerman v. UofU	<b>03:42:40</b>	Ashley Leonard
<b>08-12</b>	<b>Email to client re HHS response</b>  Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>08-12</b>	<b>Edited and finalized HHS responses</b>  Zimmerman v. UofU	<b>48:35 min</b>	Ashley Leonard
<b>08-13</b>	<b>Went thru Defs' discovery production</b>  Zimmerman v. UofU	<b>05:16:30</b>	Ashley Leonard
<b>08-14</b>	<b>Email to OC re Notice of Depos</b>  Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
<b>08-14</b>	<b>Went thru Defs' discovery production</b>  Zimmerman v. UofU	<b>03:12:56</b>	Ashley Leonard
<b>08-14</b>	<b>Email to client re discovery issues</b>  Zimmerman v. UofU	<b>34:25 min</b>	Ashley Leonard
<b>08-18</b>	<b>Prep for depos (all)</b>  Zimmerman v. UofU	<b>06:18:37</b>	Ashley Leonard
<b>08-19</b>	<b>Phone call/emails with OC re depo dates</b>  Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>08-19</b>	<b>Prep for depos (all)</b>  Zimmerman v. UofU	<b>26:09 min</b>	Ashley Leonard
<b>08-19</b>	<b>Drafted witness subpoena (Henderson)</b>  Zimmerman v. UofU	<b>29:36 min</b>	Ashley Leonard

<b>08-20</b>	<b>Prep for depos (all)</b> Zimmerman v. UofU	<b>01:30:00</b>	Ashley Leonard
<b>08-21</b>	<b>Prep for depos (all)</b> Zimmerman v. UofU	<b>02:03:42</b>	Ashley Leonard
<b>08-21</b>	<b>Drafted Responses to Defs' First Set of Disc</b> Zimmerman v. UofU	<b>02:55:37</b>	Ashley Leonard
<b>08-23</b>	<b>Drafted second set of disc requests; emailed to client</b> Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>08-23</b>	<b>Edited second set of disc requests; emailed to atty AH</b> Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>08-24</b>	<b>Edited second set of disc requests; emailed to OC</b> Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>08-25</b>	<b>Prep for depos (all)</b> Zimmerman v. UofU	<b>01:51:39</b>	Ashley Leonard
<b>08-26</b>	<b>Prep for depos (all)</b> Zimmerman v. UofU	<b>03:39:44</b>	Ashley Leonard
<b>08-26</b>	<b>Mtg with client re depos</b> Zimmerman v. UofU	<b>01:00:00</b>	Ashley Leonard
<b>08-27</b>	<b>Prep for depos (all)</b> Zimmerman v. UofU	<b>03:14:13</b>	Ashley Leonard
<b>08-27</b>	<b>Drafted Responses to Defs' First Set of Disc</b> Zimmerman v. UofU	<b>01:31:36</b>	Ashley Leonard
<b>08-28</b>	<b>Phone call with OC re discovery issues</b> Zimmerman v. UofU	<b>42:00 min</b>	Ashley Leonard
<b>08-28</b>	<b>Drafted Amended 30(b)(6) Notice; emailed to OC</b> Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>08-28</b>	<b>Drafted Responses to Defs' First Set of Disc</b> Zimmerman v. UofU	<b>01:42:40</b>	Ashley Leonard
<b>08-29</b>	<b>Prep for depos (all)</b> Zimmerman v. UofU	<b>05:53:45</b>	Ashley Leonard
<b>08-30</b>	<b>Prep for depos (all)</b> Zimmerman v. UofU	<b>01:48:00</b>	Ashley Leonard
<b>08-30</b>	<b>Edited disc responses, emails with client re responses</b> Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>08-31</b>	<b>Prep for depos (all)</b> Zimmerman v. UofU	<b>04:29:41</b>	Ashley Leonard
<b>08-31</b>	<b>Prep for depos (all)</b> Zimmerman v. UofU	<b>05:27:28</b>	Ashley Leonard
<b>09-01</b>	<b>Depo (WM)</b> Zimmerman v. UofU	<b>10:00:00</b>	Ashley Leonard
<b>09-02</b>	<b>Depo (DB)</b> Zimmerman v. UofU	<b>06:30:00</b>	Ashley Leonard

<b>09-02</b>	<b>Prep for depo (AH)</b> Zimmerman v. UofU	<b>02:12:00</b>	Ashley Leonard
<b>09-02</b>	<b>Prep for depo (DB)</b> Zimmerman v. UofU	<b>02:18:00</b>	Ashley Leonard
<b>09-03</b>	<b>Depo (CK and AH)</b> Zimmerman v. UofU	<b>09:00:00</b>	Ashley Leonard
<b>09-03</b>	<b>Edited discovery responses; emailed to OC</b> Zimmerman v. UofU	<b>01:36:00</b>	Ashley Leonard
<b>09-04</b>	<b>Batestamped docs, sent with runner to AG's office</b> Zimmerman v. UofU	<b>30:00 min</b>	Ashley Leonard
<b>09-07</b>	<b>Drafted meet and confer letter re discovery issues</b> Zimmerman v. UofU	<b>54:00 min</b>	Ashley Leonard
<b>09-07</b>	<b>Drafted Suppl Initial Discl</b> Zimmerman v. UofU	<b>30:00 min</b>	Ashley Leonard
<b>09-07</b>	<b>Emails with client re discovery</b> Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>09-10</b>	<b>Emails to OC re discovery</b> Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
<b>09-15</b>	<b>Drafted witness declarations (Gardiner and Soni)</b> Zimmerman v. UofU	<b>01:30:00</b>	Ashley Leonard
<b>09-15</b>	<b>Depo prep (AB)</b> Zimmerman v. UofU	<b>01:30:00</b>	Ashley Leonard
<b>09-15</b>	<b>Drafted Suppl Disc Responses</b> Zimmerman v. UofU	<b>01:06:00</b>	Ashley Leonard
<b>09-15</b>	<b>Drafted HIPPA releases</b> Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>09-15</b>	<b>Email to client re depositions and strategy</b> Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>09-15</b>	<b>Depo prep (30b6)</b> Zimmerman v. UofU	<b>04:31:44</b>	Ashley Leonard
<b>09-16</b>	<b>Depo (JZ)</b> Zimmerman v. UofU	<b>08:00:00</b>	Ashley Leonard
<b>09-16</b>	<b>Prep for depositions (30b6 and AB)</b> Zimmerman v. UofU	<b>30:00 min</b>	Ashley Leonard
<b>09-17</b>	<b>Depo (30(b)(6))</b> Zimmerman v. UofU	<b>04:30:00</b>	Ashley Leonard
<b>09-17</b>	<b>Depo (AB)</b> Zimmerman v. UofU	<b>02:00:00</b>	Ashley Leonard
<b>09-17</b>	<b>Mtg with client re depositions</b> Zimmerman v. UofU	<b>02:00:00</b>	Ashley Leonard
<b>09-17</b>	<b>Prep for depositions (30b6 and AB)</b> Zimmerman v. UofU	<b>48:00 min</b>	Ashley Leonard



<b>09-17</b>	<b>Email to witnesses re declarations (Gardner and Soni)</b>  Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>09-21</b>	<b>Drafted and emailed witness declaration (Sink)</b>  Zimmerman v. UofU	<b>42:00 min</b>	Ashley Leonard
<b>09-21</b>	<b>Edited and emailed witness declarations (Gardner and Soni)</b>  Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>09-23</b>	<b>Drafted Mot Compel Disc</b>  Zimmerman v. UofU	<b>01:54:00</b>	Ashley Leonard
<b>09-23</b>	<b>Drafted second meet and confer re discovery issues from depositions</b>  Zimmerman v. UofU	<b>01:18:00</b>	Ashley Leonard
<b>09-23</b>	<b>Edited and emailed witness decl (Sink)</b>  Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>09-24</b>	<b>Edited Mot Compel Disc, filed</b>  Zimmerman v. UofU	<b>02:18:00</b>	Ashley Leonard
<b>09-24</b>	<b>Edited second meet and confer re discovery issues from depositions, emailed to OC</b>  Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>09-28</b>	<b>Email to client re update and discovery issues</b>  Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>10-01</b>	<b>Emails with OC re discovery issues</b>  Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>10-16</b>	<b>Drafted and emailed letter to OC re m&amp;c disc issues</b>  Zimmerman v. UofU	<b>01:54:00</b>	Ashley Leonard
<b>10-23</b>	<b>Drafted Reply JZ Mot Compel Disc</b>  Zimmerman v. UofU	<b>02:49:42</b>	Ashley Leonard
<b>10-26</b>	<b>Drafted response to Defs' Oct 23, 2015, letter re discovery issues</b>  Zimmerman v. UofU	<b>30:00 min</b>	Ashley Leonard
<b>10-26</b>	<b>Email to client re discovery</b>  Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
<b>10-26</b>	<b>Went thru Defs' Suppl Disc</b>  Zimmerman v. UofU	<b>03:16:50</b>	Ashley Leonard
<b>10-27</b>	<b>Went thru Defs' Suppl Disc</b>  Zimmerman v. UofU	<b>05:38:35</b>	Ashley Leonard
<b>10-27</b>	<b>Drafted and filed Notice to Submit Mot Compel Disc</b>  Zimmerman v. UofU	<b>10:12 min</b>	Ashley Leonard
<b>11-03</b>	<b>Email to co-counsel re meet and confer disc issues</b>  Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
<b>11-22</b>	<b>Email to client re MSJ and DOPL Compl</b>  Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>11-25</b>	<b>Phone call with OC re Mot Compel Hearing</b>  Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard

<b>11-29</b>	<b>Email to client re discovery</b> Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
<b>12-01</b>	<b>Emailed OC re mot compel offer</b> Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
<b>12-02</b>	<b>Emails to client re mot compel discovery</b> Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>12-04</b>	<b>Phone call(s) with Orange re search terms</b> Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>12-04</b>	<b>Email(s) with Orange re search</b> Zimmerman v. UofU	<b>18:00 min</b>	Ashley Leonard
<b>12-04</b>	<b>Email to client re Orange docs/search</b> Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
<b>12-04</b>	<b>Email to OC re mot compel hearing</b> Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
<b>12-07</b>	<b>Filed Withdrawal of Mot Compel</b> Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>12-11</b>	<b>Email to OC re extending disp mot deadlines</b> Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
<b>12-15</b>	<b>Email to OC re extending expert disc</b> Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
<b>12-20</b>	<b>Reviewed suppl production of docs, emailed OC re privilege log</b> Zimmerman v. UofU	<b>24:00 min</b>	Ashley Leonard
<b>12-21</b>	<b>Reviewed Defs MSJ</b> Zimmerman v. UofU	<b>37:12 min</b>	Ashley Leonard
<b>12-21</b>	<b>Research for MSJ Opp</b> Zimmerman v. UofU	<b>05:17:01</b>	Ashley Leonard
<b>12-22</b>	<b>Research for MSJ Opp</b> Zimmerman v. UofU	<b>04:11:22</b>	Ashley Leonard
<b>12-23</b>	<b>Drafted Opp MSJ</b> Zimmerman v. UofU	<b>04:13:29</b>	Ashley Leonard
<b>12-23</b>	<b>Research for MSJ Opp</b> Zimmerman v. UofU	<b>02:40:13</b>	Ashley Leonard
<b>12-29</b>	<b>Drafted Opp MSJ</b> Zimmerman v. UofU	<b>04:00:18</b>	Ashley Leonard
<b>12-30</b>	<b>Drafted Opp MSJ</b> Zimmerman v. UofU	<b>07:52:07</b>	Ashley Leonard
<b>12-31</b>	<b>Drafted Opp MSJ</b> Zimmerman v. UofU	<b>06:14:58</b>	Ashley Leonard

# Detailed report



2016-01-01 - 2016-01-31

Total **19 h 24 min** Billable 19 h 24 min

Zimmerman v. UofU selected as projects

Date	Description	Duration	User
01-01	<b>Drafted Opp MSJ</b>  Zimmerman v. UofU	<b>03:34:18</b>	Ashley Leonard
01-02	<b>Drafted Opp MSJ</b>  Zimmerman v. UofU	<b>06:36:00</b>	Ashley Leonard
01-03	<b>Edited Opp MSJ</b>  Zimmerman v. UofU	<b>05:42:10</b>	Ashley Leonard
01-04	<b>Edited Opp MSJ</b>  Zimmerman v. UofU	<b>03:25:39</b>	Ashley Leonard
01-04	<b>Filed Opp MSJ</b>  Zimmerman v. UofU	<b>06:28 min</b>	Ashley Leonard

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# Detailed report



2016-03-01 - 2016-03-31

Total **07 h 51 min**

Billable 07 h 51 min

Zimmerman v. UofU selected as projects

Date	Description	Duration	User
03-01	Email to witness re evidence  Zimmerman v. UofU	12:00 min	Ashley Leonard
03-04	Phone convo with witness (DH) re U 2012 audit  Zimmerman v. UofU	24:00 min	Ashley Leonard
03-04	Email to client re convo with witness (DH)  Zimmerman v. UofU	12:00 min	Ashley Leonard
03-08	Email to client re client questions  Zimmerman v. UofU	12:00 min	Ashley Leonard
03-22	Email to client re HHS investigations  Zimmerman v. UofU	12:00 min	Ashley Leonard
03-25	Reviewed U's GRAMA response and report  Zimmerman v. UofU	27:04 min	Ashley Leonard
03-25	Email to client and witness (DH) re Sept. 2012 audit  Zimmerman v. UofU	12:00 min	Ashley Leonard
03-28	Research re HHS investigation's confidentiality  Zimmerman v. UofU	24:00 min	Ashley Leonard
03-31	Prep for MSJ oral argument  Zimmerman v. UofU	05:36:10	Ashley Leonard

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# Detailed report

2016-04-01 - 2016-04-30

Total **20 h 04 min** Billable 20 h 04 min

Zimmerman v. UofU selected as projects

Date	Description	Duration	User
04-01	<b>Prep for MSJ oral argument</b> Zimmerman v. UofU	<b>07:46:37</b>	Ashley Leonard
04-02	<b>Prep for MSJ oral argument</b> Zimmerman v. UofU	<b>01:36:00</b>	Ashley Leonard
04-04	<b>MSJ oral argument hearing</b> Zimmerman v. UofU	<b>02:30:00</b>	Ashley Leonard
04-04	<b>Phone call with atty AH re MSJ oral argument</b> Zimmerman v. UofU	<b>30:00 min</b>	Ashley Leonard
04-04	<b>Email to client re MSJ oral argument</b> Zimmerman v. UofU	<b>12:00 min</b>	Ashley Leonard
04-04	<b>Prep for MSJ oral argument</b> Zimmerman v. UofU	<b>30:00 min</b>	Ashley Leonard
04-10	<b>Drafted Suppl Opp to Defs' MSJ</b> Zimmerman v. UofU	<b>02:00:00</b>	Ashley Leonard
04-10	<b>Drafted Opp to Defs' Mot for Leave to File Dispositive Mot</b> Zimmerman v. UofU	<b>01:00:00</b>	Ashley Leonard
04-11	<b>Edited and filed Suppl Opp to Defs' MSJ</b> Zimmerman v. UofU	<b>01:12:00</b>	Ashley Leonard
04-25	<b>Drafted Opp to Defs' JML</b> Zimmerman v. UofU	<b>02:48:00</b>	Ashley Leonard

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# Detailed report



2016-05-01 - 2016-05-31

Total 00 h 48 min Billable 00 h 48 min

Zimmerman v. UofU selected as projects

Date	Description	Duration	User
05-23	Reviewed Supreme Court decision, drafted and submitted notice of supplemental authority re whistleblower COA	48:00 min	Ashley Leonard
Zimmerman v. UofU			

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# Detailed report

2016-07-01 - 2016-07-31

Total **00 h 54 min** Billable 00 h 54 min

Zimmerman v. UofU selected as projects

Date	Description	Duration	User
07-25	Research for Opp Defs Second JML	24:00 min	Ashley Leonard
	Zimmerman v. UofU		
07-25	Drafted Opp to Defs Second JML	30:00 min	Ashley Leonard
	Zimmerman v. UofU		

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Katie Bushman  
 1726 E Millcreek Way  
 Salt Lake City, UT 84106  
 (801) 833-8861









<b>DATE</b>	<b>DESCRIPTION</b>	<b>MINUTES</b>
12/01/16	REVIEWING ZIMMERMAN BRIEFING	120
12/06/16	REVIEWING CASES CITED IN BRIEFING	360
12/12/16	REVIEWING CASES CITED IN BRIEFING	120
12/15/16	RESEARCHING SELF-EXECUTING FSC IN OTHER JDX	120
12/16/16	RESEARCHING SELF-EXECUTING FSC IN OTHER JDX	162
12/17/16	RESEARCHING SELF-EXECUTING FSC IN OTHER JDX	60
12/21/16	RESEARCHING SELF-EXECUTING FSC IN OTHER JDX	36
12/22/16	RESEARCHING SELF-EXECUTING FSC IN OTHER JDX	30
12/23/16	RESEARCHING SELF-EXECUTING FSC IN OTHER JDX & REVIEWING UTAH CASES/CONSTITUTION	600
12/24/16	RESEARCHING SELF-EXECUTING FSC IN OTHER JDX & OTHER STATE CONSTITUTIONS	210
12/25/16	RESEARCHING SELF-EXECUTING FSC IN OTHER JDX, RESEARCHING POTENTIAL ELEMENTS OF FSC CLAIM	84
12/26/16	RESEARCHING SELF-EXECUTING FSC IN OTHER JDX, RESEARCHING POTENTIAL ELEMENTS OF FSC CLAIM, WRITING SYNOPSIS OF FINDINGS	240










TOTAL MINUTES: 2142









HOURS: 35.7









































ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
 <b>Review/analyze</b> Review amended complaint	12/19/2014	0.4	\$375.00	\$150.00	
 <b>Draft/revise</b> Edit discovery requests	12/23/2014	0.6	\$375.00	\$225.00	
 <b>Draft/revise</b> Edit reply re: motion to compel	10/26/2015	0.8	\$375.00	\$300.00	
 <b>Review/analyze</b> Review/edit sj opp brief	1/3/2016	2.5	\$375.00	\$937.50	
 <b>Review/analyze</b> Review sj pleadings	3/3/2016	2.5	\$375.00	\$937.50	
 <b>Review/analyze</b> Review, advise re: sj pleadings for hearing	4/2/2016	2.3	\$375.00	\$862.50	
 <b>Phone call</b> Phone call w/ Ashley re: sj hearing	4/4/2016	0.6	\$375.00	\$225.00	
 <b>Communicate (other external)</b> Phone calls w/ reporter, client; review emails from client to reporter	7/6/2016	0.5	\$375.00	\$187.50	
 <b>Communicate (other external)</b> Phone call w/ client re: info to give reporter	7/7/2016	0.1	\$375.00	\$37.50	















ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<a href="#">▶ Draft/revise</a> Legal research; edit opposition to second motion to dismiss; draft motion to amend complaint	8/12/2016	2.3	\$375.00	\$862.50	
<a href="#">▶ Draft/revise</a> Edit, file response to motion to dismiss	8/15/2016	0.7	\$375.00	\$262.50	
<a href="#">▶ Phone call</a> Phone call w/ client	8/19/2016	0.4	\$375.00	\$150.00	
<a href="#">▶ Draft/revise</a> Review pleadings; draft designation of record relevant to certified questions	8/22/2016	0.5	\$375.00	\$187.50	
<a href="#">▶ Draft/revise</a> Draft proposed second amended complaint; send to oc	8/24/2016	0.3	\$375.00	\$112.50	
<a href="#">▶ Draft/revise</a> Draft opposition to Defs motion for leave to file sj 2	9/12/2016	2.9	\$375.00	\$1,087.50	
<a href="#">▶ Phone call</a> Phone call w/ client re: sj2	12/21/2016	0.2	\$375.00	\$75.00	
<a href="#">▶ Review/analyze</a> Review motion for sj re: First Amendment	12/27/2016	0.8	\$375.00	\$300.00	

















ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<a href="#">▶ Draft/revise</a> Legal research; draft brief re: certified questions	1/2/2017	7.8	\$375.00	\$2,925.00	
<a href="#">▶ Draft/revise</a> Draft brief to Supreme Court	1/3/2017	10.5	\$375.00	\$3,937.50	
<a href="#">▶ Draft/revise</a> Edit/finalize brief to Supreme Court	1/4/2017	7.5	\$375.00	\$2,812.50	
<a href="#">▶ Research</a> Legal research re: First Amendment claim	1/10/2017	2	\$375.00	\$750.00	
<a href="#">▶ Research</a> Research on First Amendment claims; review documents; draft opposition memo	1/11/2017	7.5	\$375.00	\$2,812.50	
<a href="#">▶ Phone call</a> Phone call w/ client; review pleadings, docs; draft opp memo	1/12/2017	5.5	\$375.00	\$2,062.50	
<a href="#">▶ Time</a> Phone call w client	1/13/2017	0.7	\$375.00	\$262.50	
<a href="#">▶ Research</a> Research on First Amendment claims	1/14/2017	1.5	\$375.00	\$562.50	
<a href="#">▶ Draft/revise</a> Draft opp to sj	1/15/2017	0.9	\$375.00	\$337.50	

ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<p> <b>Draft/revise</b></p> <p>Draft opposition to summary judgment; phone call w/ client</p>	1/16/2017	3.1	\$375.00	\$1,162.50	
<p> <b>Draft/revise</b></p> <p>Draft opposition to motion for summary judgment</p>	1/17/2017	8.5	\$375.00	\$3,187.50	
<p> <b>Draft/revise</b></p> <p>Revise federal complaint; draft state complaint</p>	3/21/2017	1.9	\$375.00	\$712.50	
<p> <b>Phone call</b></p> <p>Phone call w/ client</p>	3/21/2017	0.6	\$375.00	\$225.00	
<p> <b>Draft/revise</b></p> <p>Draft reply brief</p>	4/12/2017	4.9	\$375.00	\$1,837.50	
<p> <b>Draft/revise</b></p> <p>Edit reply brief</p>	4/13/2017	2.1	\$375.00	\$787.50	
<p> <b>Review/analyze</b></p> <p>Review decision on First Amendment</p>	8/14/2017	0.6	\$375.00	\$225.00	
<p> <b>Review/analyze</b></p> <p>Review pleadings for S Ct argument</p>	9/12/2017	0.5	\$375.00	\$187.50	
<p> <b>Plan and prepare for</b></p> <p>Prepare for oral argument</p>	9/14/2017	4.3	\$375.00	\$1,612.50	















ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
 <b>Plan and prepare for</b> Prep for oral argument	9/14/2017	6.5	\$375.00	\$2,437.50	
 <b>Plan and prepare for</b> Prep for oral argument	9/14/2017	6.5	\$375.00	\$2,437.50	
 <b>Plan and prepare for</b>	9/14/2017	6.5	\$375.00	\$2,437.50	
 <b>Appear for/attend</b>	9/15/2017	1.7	\$375.00	\$637.50	
 <b>Draft/revise</b> Review U policies; edit state complaint	11/9/2017	0.8	\$375.00	\$300.00	
 <b>Draft/revise</b> Edit state complaint, email client	11/13/2017	0.8	\$375.00	\$300.00	
 <b>Phone call</b> Phone call w/ client; edit, file complaint	11/15/2017	0.3	\$375.00	\$112.50	
 <b>Draft/revise</b> Draft/send waiver of service form; review SCt decision; phone call w/ client; email oc	1/23/2018	0.6	\$375.00	\$225.00	
 <b>Phone call</b> Phone calls w/ Densley, client; review emails from client	1/30/2018	0.7	\$375.00	\$262.50	
 <b>Phone call</b> Phone call w/ Judy; email to Densley	2/1/2018	0.5	\$375.00	\$187.50	















ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
 <b>Draft/revise</b> Draft response to sj in state case	4/3/2018	1.5	\$375.00	\$562.50	
 <b>Phone call</b> Phone calls w/ opp counsel, client; attend status conference; draft opp to msj re: contract claim	4/6/2018	3.8	\$375.00	\$1,425.00	
 <b>Draft/revise</b> Draft opposition to sj in state case	4/6/2018	9.5	\$375.00	\$3,562.50	
 <b>Draft/revise</b> Edit second amended complaint to incorporate all prior rulings	4/12/2018	0.8	\$375.00	\$300.00	
 <b>Review/analyze</b> Review Defs msj	4/26/2018	0.5	\$375.00	\$187.50	
 <b>Draft/revise</b> Draft motion to strike	4/27/2018	1.8	\$375.00	\$675.00	
 <b>Review/analyze</b> Review Defs msj	5/1/2018	0.5	\$375.00	\$187.50	
 <b>Draft/revise</b> Draft supplemental brief	5/1/2018	0.3	\$375.00	\$112.50	
 <b>Draft/revise</b> Draft supplemental brief	5/3/2018	0.7	\$375.00	\$262.50	

ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<p> <b>Review/analyze</b></p> <p>Review materials re: Utah Constitution at law library</p>	5/3/2018	0.9	\$375.00	\$337.50	
<p> <b>Review/analyze</b></p> <p>Review materials on Constitution at Marriott Library; draft/edit supplemental brief</p>	5/4/2018	7.3	\$375.00	\$2,737.50	
<p> <b>Draft/revise</b></p> <p>Draft reply re: motion to strike</p>	5/29/2018	3.7	\$375.00	\$1,387.50	
<p> <b>Phone call</b></p> <p>Phone calls w/ opp counsel, client; review stipulation re withdrawal of arguments</p>	6/20/2018	0.7	\$375.00	\$262.50	
<p> <b>Research</b></p> <p>Review msj; research 1983 claims against state, officials; pc w/ attorneys at S&amp;S regarding issue; draft response to sj</p>	6/26/2018	3.5	\$375.00	\$1,312.50	
<p> <b>Review/analyze</b></p> <p>Review msj re: Rehab Act, prior filings, depositions; phone call w/ client</p>	6/27/2018	3.2	\$375.00	\$1,200.00	
<p> <b>Draft/revise</b></p> <p>Draft, edit opposition to sj re: 1983 issue</p>	6/28/2018	2.5	\$375.00	\$937.50	

ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<p> <b>Draft/revise</b></p> <p>Draft supplemental brief</p>	7/1/2018	2.8	\$375.00	\$1,050.00	
<p> <b>Draft/revise</b></p> <p>Legal research re: Spackman elements; draft and edit supplemental brief; phone call w/ client re: litigation strategies</p>	7/2/2018	2.8	\$375.00	\$1,050.00	
<p> <b>Phone call</b></p> <p>Phone calls w/ client; review pretrial disclosures; start reviewing, compiling exhibits for trial; draft jury instructions; schedule all deadlines</p>	7/6/2018	4.2	\$375.00	\$1,575.00	
<p> <b>Phone call</b></p> <p>Phone call w/ client; review depositions, documents for trial</p>	7/7/2018	0.7	\$375.00	\$262.50	
<p> <b>Review/analyze</b></p> <p>Review exhibits; draft exhibit list; review depo transcripts</p>	7/8/2018	4.5	\$375.00	\$1,687.50	
<p> <b>Review/analyze</b></p> <p>Review documents; draft exhibit list</p>	7/9/2018	7.5	\$375.00	\$2,812.50	
<p> <b>Review/analyze</b></p> <p>Review exhibits; create trial exhibit list</p>	7/10/2018	5.8	\$375.00	\$2,175.00	
<p> <b>Email</b></p> <p>Emails w/ oc about documents, dropping religious discrimination claim</p>	7/11/2018	0.3	\$375.00	\$112.50	

















ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<p> <b>Draft/revise</b></p> <p>Review, draft jury instructions</p>	7/15/2018	2.2	\$375.00	\$825.00	
<p> <b>Review/analyze</b></p> <p>Draft, review, edit jury instructions, verdict form; emails to/from oc, client re: Randall depo, instructions</p>	7/16/2018	5.3	\$375.00	\$1,987.50	
<p> <b>Phone call</b></p> <p>Phone call w/ Rod Larson; review court's decisions; pc w/ client; emails w/ oc re: witnesses; review Pickens depo</p>	7/17/2018	1.5	\$375.00	\$562.50	
<p> <b>Phone call</b></p> <p>Email oc re: Rod Larson depo; phone calls w/ client re: witnesses</p>	7/18/2018	1.1	\$375.00	\$412.50	
<p> <b>Review/analyze</b></p> <p>Review our exhibits, put in chron order; draft notes for MIL meeting; phone conference w/ oc re: MILs; pc w/ client</p>	7/19/2018	2.8	\$375.00	\$1,050.00	
<p> <b>Review/analyze</b></p> <p>Review, respond to email from opp counsel; review Defs' proposed trial exhibits; draft emails re: OEO evidence and authenticity of docs; review Amy Henderson depo</p>	7/20/2018	3.2	\$375.00	\$1,200.00	
<p> <b>Meeting</b></p> <p>Prep for, meet w/ Amy Henderson</p>	7/21/2018	3.3	\$375.00	\$1,237.50	

















ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<p> <b>Draft/revise</b></p> <p>Draft motions in limine; review rules of evidence; phone calls w/ client re: additional docs needed for exhibits</p>	7/23/2018	3.8	\$375.00	\$1,425.00	
<p> <b>Phone call</b></p> <p>Phone call w/ client re: witnesses; review stipulation from oc, propose changes</p>	7/26/2018	0.8	\$375.00	\$300.00	
<p> <b>Phone call</b></p> <p>Phone calls w/ client, opp counsel re: exhibits, witnesses; draft updated witness list</p>	7/27/2018	2.1	\$375.00	\$787.50	
<p> <b>Phone call</b></p> <p>Phone call w/ client</p>	7/28/2018	0.5	\$375.00	\$187.50	
<p> <b>Draft/revise</b></p> <p>Draft oppositions to motions in limine; meet w/ Katie re: research projects; phone conference with oc re: jury instructions; pc w/ client re: info for motions</p>	7/30/2018	14.5	\$375.00	\$5,437.50	
<p> <b>Research</b></p> <p>Research trial/evidentiary issues</p>	7/30/2018	7	\$95.00	\$665.00	
<p> <b>Review/analyze</b></p> <p>Phone call w/ Larson, set up depo; amend exhibit list; draft voir dire; find missing docs in Defs exhibits; pc w/ client</p>	7/31/2018	4.2	\$375.00	\$1,575.00	

ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<b>Phone call</b> Phone calls setting up depo in Houston; phone calls w/ client; phone calls to witnesses; meetings w/ Katie re: jury instruction objections	8/1/2018	0.8	\$375.00	\$300.00	AH
<b>Review/analyze</b> Review, research, and draft objections to Defs jury instructions	8/1/2018	4.5	\$95.00	\$427.50	KP
<b>Research</b> Research re: punitive damage instructions	8/2/2018	6.5	\$95.00	\$617.50	KP
<b>Phone call</b> Phone calls w/ witnesses; discuss jury instructions w/ Katie; draft subpoenas	8/2/2018	2.5	\$375.00	\$937.50	AH
<b>Draft/revise</b> Drafting, researching jury instruction objections	8/3/2018	3.5	\$95.00	\$332.50	KP
<b>Research</b> Research, draft trial briefd	8/3/2018	3	\$95.00	\$285.00	KP
<b>Phone call</b> Phone calls w/ witnesses; pc w/ client; review exhibits; draft subpoenas; emails w/ opp counsel, witnesses; discuss jury instructions w/ Katie	8/3/2018	4.5	\$375.00	\$1,687.50	AH

ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<a href="#">Plan and prepare for</a> Prep for trial: review objections re: jury instructions; review depo transcripts	8/5/2018	2	\$375.00	\$750.00	AH
<a href="#">Phone call</a> Phone calls (interview) w/ Larson, test deposition equipment; legal research; meetings w/ Katie re: trial brief; edit objections; prep for H. Randall depo	8/6/2018	8	\$375.00	\$3,000.00	AH
<a href="#">Draft/revise</a> Drafting trial brief; researching jury instructions	8/6/2018	7	\$95.00	\$665.00	KP
<a href="#">Review/analyze</a> Review Harper Randall depo, suggest excerpts for trial	8/7/2018	3.5	\$95.00	\$332.50	KP
<a href="#">Draft/revise</a> Draft trial brief	8/7/2018	5	\$95.00	\$475.00	KP
<a href="#">Meeting</a> Meeting w/ client; Harper Randall depo; pc w/ Ryan Randall; meeting w/ Katie	8/7/2018	3.8	\$375.00	\$1,425.00	AH
<a href="#">Email</a> Emails re: voir dire, instructions, emails re: witnesses	8/7/2018	0.8	\$375.00	\$300.00	AH

ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<b>Plan and prepare for</b> Prep for trial (review court's order; interview w/ Larson; review, respond to emails from opp counsel; phone calls w/ client; meetings w/ Katie; edit trial brief)	8/8/2018	5.9	\$375.00	\$2,212.50	AH
<b>Draft/revise</b> Research, draft trial brief	8/8/2018	7.5	\$95.00	\$712.50	KP
<b>Draft/revise</b> Draft reply re: jury instructions; review Zimmerman depo	8/9/2018	6.3	\$95.00	\$598.50	KP
<b>Phone call</b> Phone calls w/ witnesses; prep for Larson depo	8/9/2018	4.2	\$375.00	\$1,575.00	AH
<b>Appear for/attend</b> Attend Rod Larson depo; draft reply re: jury instructions	8/10/2018	5	\$95.00	\$475.00	KP
<b>Deposition</b> Deposition of Rod Larson; meeting w/ client	8/10/2018	2.5	\$375.00	\$937.50	AH
<b>Plan and prepare for</b> Review McMahon depo	8/11/2018	3	\$375.00	\$1,125.00	AH
<b>Review/analyze</b> Review McMahon Deposition; phone call w/ client; file exhibits re: MIL2	8/12/2018	2.5	\$375.00	\$937.50	AH

ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
 <b>Plan and prepare for</b> Trial prep: review Stillman's depo	8/12/2018	1.1	\$375.00	\$412.50	
 <b>Plan and prepare for</b> Trial prep: phone calls w/ witnesses, client; review McMahon's deposition	8/13/2018	10.5	\$375.00	\$3,937.50	
 <b>Review/analyze</b> Organizing and marking exhibit binder; reviewing depos	8/13/2018	5.5	\$95.00	\$522.50	
 <b>Review/analyze</b> Reviewing depos; organizing and reviewing exhibits; pretrial hearing	8/14/2018	6.5	\$95.00	\$617.50	
 <b>Plan and prepare for</b> Prep for, attend pretrial hearing; meeting w/ client; research, emails w/ oc re: ex parte contacts w/ witness; review docs for interviews w/ witnesses	8/14/2018	8.5	\$375.00	\$3,187.50	
 <b>Plan and prepare for</b> Meetings with Babitz, Sperry; draft motion re: Gray testimony; emails w/ witnesses; review exhibits, prep witness exams	8/15/2018	8.5	\$375.00	\$3,187.50	
 <b>Review/analyze</b> Reviewing depos, Defendants' exhibits	8/15/2018	7	\$95.00	\$665.00	

ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
 <b>Review/analyze</b> Review Defs exhibits	8/16/2018	6.3	\$95.00	\$598.50	
 <b>Plan and prepare for</b> Prep for trial: pcs w/ client; draft witness exams; review depositions	8/16/2018	8.2	\$375.00	\$3,075.00	
 <b>Plan and prepare for</b> Trial prep: meeting w/ McIntosh; pc with Satterfield; draft witness exams; review Defs exhibits for objections; discuss strategies w/ Katie; pcs w/ client	8/17/2018	11	\$375.00	\$4,125.00	
 <b>Research</b> Research evidentiary issues; review depositions, exhibits	8/17/2018	6	\$95.00	\$570.00	
 <b>Draft/revise</b> Create timeline of events	8/18/2018	1.5	\$95.00	\$142.50	
 <b>Plan and prepare for</b> Trial prep	8/18/2018	3.5	\$375.00	\$1,312.50	
 <b>Plan and prepare for</b> prep for trial	8/19/2018	12.5	\$375.00	\$4,687.50	
 <b>Draft/revise</b> Creating power point slide of timeline	8/19/2018	2.5	\$95.00	\$237.50	

ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<p>▶ <b>Appear for/attend</b> Attend trial; Reviewing, highlighting depos; prepping exhibits</p>	8/20/2018	12.5	\$95.00	\$1,187.50	KP
<p>▶ <b>Plan and prepare for</b> Trial; Prep for next day</p>	8/20/2018	14.5	\$375.00	\$5,437.50	AH
<p>▶ <b>Plan and prepare for</b> Trial, prep for next day</p>	8/21/2018	16	\$375.00	\$6,000.00	AH
<p>▶ <b>Appear for/attend</b> Attend trial; prep exhibits, review depos</p>	8/21/2018	12	\$95.00	\$1,140.00	KP
<p>▶ <b>Appear for/attend</b> Trial; review depos for next day witnesses</p>	8/22/2018	9	\$95.00	\$855.00	KP
<p>▶ <b>Plan and prepare for</b> Trial; prep for next day</p>	8/22/2018	15	\$375.00	\$5,625.00	AH
<p>▶ <b>Plan and prepare for</b> Trial; prep for next day</p>	8/23/2018	13.5	\$375.00	\$5,062.50	AH
<p>▶ <b>Appear for/attend</b> Trial</p>	8/23/2018	8	\$95.00	\$760.00	KP
<p>▶ <b>Time</b> Trial; review and propose objections re: verdict form, jury instructions</p>	8/24/2018	9	\$95.00	\$855.00	KP



ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<p>▶ <b>Appear for/attend</b></p> <p>Trial; meet w/ client; file objections; research re: trial docs</p>	8/24/2018	10.5	\$375.00	\$3,937.50	AH
<p>▶ <b>Plan and prepare for</b></p> <p>Prep for trial; phone calls w/ client, Babitz</p>	8/25/2018	7.3	\$375.00	\$2,737.50	AH
<p>▶ <b>Draft/revise</b></p> <p>Help with closing argument; create power point</p>	8/25/2018	6	\$95.00	\$570.00	KP
<p>▶ <b>Plan and prepare for</b></p> <p>Meeting re: rebuttal; assist with closing; edit power point</p>	8/26/2018	8	\$95.00	\$760.00	KP
<p>▶ <b>Plan and prepare for</b></p> <p>Trial prep</p>	8/26/2018	11.5	\$375.00	\$4,312.50	AH
<p>▶ <b>Plan and prepare for</b></p> <p>Trial; prep for closing</p>	8/27/2018	17.5	\$375.00	\$6,562.50	AH
<p>▶ <b>Meeting</b></p> <p>Meeting re: closing; assist w/ closing prep; edit power pt</p>	8/27/2018	11.5	\$95.00	\$1,092.50	KP
<p>▶ <b>Appear for/attend</b></p> <p>Trial; meeting w/ client</p>	8/28/2018	8	\$95.00	\$760.00	KP

ITEM	DATE ↑	HRS.	RATE	TOTAL	BILLED BY
<p>▶ <b>Appear for/attend</b></p> <p>Prep for closing; trial; finalize opp to motion jmol</p>	8/28/2018	12.5	\$375.00	\$4,687.50	AH
<p>▶ <b>Appear for/attend</b></p> <p>Appear for verdict; discussions between jury; meet w/ client</p>	8/29/2018	3.5	\$375.00	\$1,312.50	AH
<p>▶ <b>Appear for/attend</b></p> <p>Attend verdict; meet with jurors; meeting w/ client</p>	8/29/2018	3.5	\$95.00	\$332.50	KP
<p>▶ <b>Phone call</b></p> <p>Phone call w/ foreperson</p>	9/5/2018	1.2	\$375.00	\$450.00	AH
<p>▶ <b>Research</b></p> <p>Searching discovery for docs privacy office used in determination; reading summary judgment/opp./reply</p>	9/10/2018	4.5	\$95.00	\$427.50	KP
<p>▶ <b>Email</b></p> <p>Draft declaration in support of fee petition; email to Lisa Peck re: declaration</p>	9/13/2018	0.4	\$375.00	\$150.00	AH
<p>▶ <b>Review/analyze</b></p> <p>Review, compile fees; draft motion/declaration</p>	9/18/2018	3.2	\$150.00	\$480.00	AH
<p>▶ <b>Draft/revise</b></p> <p>Compile records for costs, attorney fees; draft/finalize motion, declaration</p>	9/19/2018	5.2	\$375.00	\$1,950.00	AH

⋮	ITEM	⋮	DATE ↑	⋮	HRS.	⋮	RATE	⋮	TOTAL	⋮	BILLED BY	⋮
					651.00				\$191,297.00 USD			